



PHILLIPS 66 COMMUNICATIONS INC.
P O Box 6000
BARTLESVILLE, OK 74003-6000

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: RM-11738
Ex Parte Letter

Dear Ms. Dortch:

Phillips 66 Communications, Inc. ("Phillips 66") very much appreciates pdvWireless, Inc.'s ("PDV") cooperation in responding to two Phillips 66 900 MHz spectrum requests.

At our refinery in Rodeo, California, we received from a PDV subsidiary a frequency below 937 MHz in exchange for one above 937 MHz. That same PDV subsidiary also agreed to accept a higher ERP on other 900 MHz frequencies in that same Phillips 66 system on which such PDV subsidiary is a co-channel licensee than could have been authorized under Section 90.621(b). The frequency exchange and the increased power were instrumental in our efforts to upgrade coverage of the Rodeo system. At our refinery in Linden, New Jersey, that same PDV subsidiary not only agreed to a frequency swap of above and below 937 MHz frequencies that, again, resulted in post-exchange system capabilities superior to those prior to the exchange, but also made additional frequencies licensed to that PDV subsidiary available to us to expand the system's capacity.

Like other companies engaged in Critical Infrastructure Industry ("CII") activities, Phillips 66 expects its need for broadband communications to continue to expand. It shares the concerns CII representatives have expressed to the FCC that commercial broadband systems may not be built to satisfy the reliability and coverage requirements of this industry or provide the necessary priority access for certain functions. Phillips 66 does not know at this time whether the broadband operations proposed by EWA/PDV at 900 MHz would address the company's future requirements. It recognizes that there are complex issues that would need to be resolved before the FCC could determine that adoption of the proposal would serve the public interest. Based on its experience in the two situations described above, Phillips 66 reasonably believes that PDV would fulfill the obligations the FCC might impose on PDV or any of its subsidiary entities as a broadband licensee.

Respectfully,

A handwritten signature in cursive script, appearing to read "D. L. Hedman".

June 15, 2016

Phillips 66 Communications, Inc.